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File No.: 21-1800

July 28, 2016

VIA ELECTRONIC FILING & LAWYERS SERVICE

Honorable Peter G. Sheridan, U.S.D.J.
United States District Court
Clarkson S. Fisher Federal Building &
United States Courthouse
Room 5000
402 E. State Street
Trenton, New Jersey 08608

Sept. 7, 2016 at 3:00pm

SO ORDERED: *Peter M. Sheridan*
DATED: *8/19/16*

Re: United States v. Thomas Shannon
Cr. No. 15-275

Dear Judge Sheridan:

As Your Honor is aware, this firm represents Mr. Thomas Shannon with regard to the above-captioned matter.

I am in receipt of the Court's notice rescheduling the sentencing of Mr. Shannon from August 29th to September 8, 2016 at 11:30 a.m. before Your Honor.

Please be advised that I have a sentencing scheduled for September 8, 2016 at 9:00 a.m. at the Monmouth County Courthouse before Judge Oxley on State v. Philip Seidle. This is a high profile murder case wherein Mr. Seidle's family will be appearing from out of state for his sentencing.

As such, I am respectfully requesting the Mr. Shannon's sentencing be rescheduled for a different date. For the Court's convenience, I am available on September 7th or September 9th.

Thereafter, I am scheduled to start trial on September 13, 2016 in Middlesex County Superior Court before Judge Rivas on State v. B. McInerney. I anticipate this trial to last 4 - 6 weeks.

Remit to:

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Please be advised that my office has contacted A.U.S.A. Nicholas Grippo and he consents to my request for an adjournment and has advised that he is also available on September 7th and September 9th.

I will await the Court's decision and thank you for your assistance in this regard.

Respectfully submitted,

S/ EDWARD C. BERTUCIO, ESQ.
EDWARD C. BERTUCIO, ESQ.

ECB/ctd

cc: Nicholas Grippo, A.U.S.A. (via electronic filing & regular mail)

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